

Individual RWAs

The UK Environment Agencies awarded grandfather rights to those radiation professionals that could demonstrate they were working as Radioactive Waste Advisers before December 2012. These grandfather rights lapse at the end of June 2016 and holders should have submitted their portfolios to RPA 2000 by the well-publicised deadline of 31 December 2014 to ensure that their assessment is completed by the end of June. It is clear that a number of RWAs with grandfather rights missed this deadline and submitted late. RPA 2000 received 104 applications in 2014, 46 in 2015 and 14 to date in 2016.

RPA 2000 has completed assessment of all applications received by the deadline.

If RWAs missed the deadline RPA 2000 wrote telling them they will complete the assessment by March 2017. RPA 2000 holds the most up to date information and may be able to give an estimate of when an individual applicant's portfolio will be assessed.

After 30 June 2016, anyone acting as an RWA must hold a certificate of competence issued by RPA 2000.

The permits and authorisations issued by the UK Environment Agencies require permit holders to "manage and operate the activities in consultation with such suitable radioactive waste advisors as are necessary for the purpose of advising the operator as to compliance with this permit". Clearly, this situation puts permit holders in a difficult position, as failing to

have a qualified RWA is a breach of their permit or authorisation.

The heads of radioactive substances regulation from the UK environment agencies considered this matter and concluded that any approach will be in line with each regulator's enforcement policy. This means that if permit compliance is otherwise good, and the RWA has submitted their application to RPA 2000 or the operator is in the process of appointing a certified RWA we are likely to consider this as a relatively minor issue. However, each regulator will deal with each site on a case-by-case basis, with any other non-compliance informing the approach taken in line with their enforcement policy.

Corporate Radioactive Waste Advisers

As grandfather rights draw to a close on 30 June 2016, the RWA Approval Board has been busy making decisions on applications received from nuclear licensed sites for Corporate Radioactive Waste Advisers. All applications received have now been approved and the following permit holders have approved Corporate Arrangements in place:

Magnox
Sellafield Limited
EDF Energy Nuclear Generation Limited
NNB Generation Company Limited
LLWR Limited
Urenco UK Limited
Dounreay Site Restoration Limited
Springfield Fuels Limited
AWE

Once the Corporate Arrangements are approved, the permit holder is inspected for ongoing compliance as part of the routine inspection of the site.

The RWA Approval Board would like to thank all those that have been involved in the preparation and assessment of Corporate Arrangements.